

**REMARKS**

Claims 1-20 are pending in the above-referenced patent application. Claims 21-26 have been added by this amendment. No new matter has been added. Claims 1-20 were rejected under 35 U.S.C. 102(e) as being anticipated by USPN 6,523,696 to Saito et al ("Saito"). Rejection of the claims is respectfully traversed because Saito does not disclose all of the limitations of the Claims. Further, the claims have been amended to further clarify the differences between the claimed invention and Saito.

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As per Claim 1, Saito does not disclose providing user interfaces in a first network including first devices interconnected via a communication medium and at least one interface device connecting said first network to at least a second network having interconnected second devices. Saito does not describe obtaining information from said first devices currently connected to the first network, said information including graphical and/or textual information, and obtaining graphical and/or textual information from the interface device about the second devices connected to the second network, as required by Claim 1.

The Patent Office interprets Saito as disclosing first and second network 203 connected by an interface device 210 (Fig. 7), and obtaining information from devices connected to first and second networks (col. 21, lines 5-10). This interpretation of Saito is respectfully traversed because it goes against the teachings of Saito. In Fig. 7, Saito specifically shows a 1<sup>st</sup> HOME NETWORK comprising elements 201, 204, 206 and 207, and a 2<sup>nd</sup> HOME NETWORK comprising elements 203, 205, 208, 209, 210, 211, 212, 213 and 214 (col. 18, line 48 to col. 19, line 5). The Patent Office's interpretation is totally inconsistent with the teachings of Saito which specifically defines the first and second networks, and the elements thereof.

Further, the PC 210 in the second home network, is not an "interface device" as claimed herein. In one embodiment, the interface device claimed herein comprises a device, such as a bridge, that separates two dissimilar networks. Indeed, in col. 21, lines 41-49, Saito specifically states:

Now, the PC 210 is also connected to the home automation network 212 so that it also functions as a home automation server.... this PC 210 carries out controls of various devices (the air conditioner 213 and the microwave oven 214) connected to the home automation network 212.... this implies that a terminal connected to the second 1394 bus 203 can control various devices connected to the home automation network 212 by making access to this PC 210.

Clearly then the Patent Office is reading information into Saito that is not in anyway disclosed therein as understood by one of ordinary skill in the art. And, the Patent Office is interpreting the language of the claims herein out of context of the present invention. The

differences between the PC 210 and the interface device are described further below in conjunction with Claim 5.

Further, in col. 21, lines 5-10 and lines 50-60 (referenced by the Patent Office), Saito does not disclose: “obtaining information from the interface device about the second devices connected to the second network,” as required by Claim 1, because there is no interface device in Saito as claimed herein.

Saito does not disclose generating a user interface description in one or more of said first devices based at least on the obtained information, the user interface description including: (1) at least one graphical and/or textual reference of said first devices, and (2) at least one graphical and/or textual reference of said second devices,” as required by Claim 1.

According to an embodiment of the present invention, one or more control devices receive graphical and/or textual information such as icon and logo information from devices to be controlled which are connected to first and second networks, and generate a list page of devices to be controlled. The controlled device list page is a file which is received from the devices to be controlled, but is not directly in the control devices. Also, the devices to be controlled transmit a control page, through which the devices to be controlled can be controlled, to the control devices. The control page includes the graphical and/or textual information with

which devices to be controlled can be controlled. However, Saito does not disclose such limitations.

The Patent Office interprets Saito to disclose such limitations in Fig. 14, and col. 23, lines 12-23. However, Saito states that: "FIG. 14 is a diagram showing an exemplary screen display in the case of device specific display in the network system of FIG. 7," (col. 10, lines 7-8). As such, Fig. 14 shows a screen display, not a user interface description as claimed herein.

Further, in col. 23, lines 12-23 (referenced by the Patent Office), Saito simply states:

Next, FIG. 14 shows an exemplary screen display in the case of terminal specific display. Similarly as in the case of service specific display, one icon (i11 to i15) is provided for each terminal provided on the second home network, and the user can make an access to a desired service by specifying that service using a prescribed user interface (by executing click or drag-and-drop on a mouse device, for example). Here, the screen display of terminal specific icons shown in FIG. 14 also displays both services connected to the second IEEE 1394 bus 203 and services connected to the home automation network 212 without distinguishing different network types.

Again Saito is clear that FIG. 14 shows a screen display, not a user interface description as claimed herein. The Patent Office fails to show where in FIG. 14 and the above passage Saito discloses a user interface description including: (1) at least one reference of said first devices, and (2) at least one reference comprising an electronic link providing access to the device information of each of said second devices, as required by Claim 1.

According to the present invention, the user interface description is first generated and then in another step, that user interface description is utilized to generate and display one or more user interfaces (e.g., Claim 6). In other words, the user interface description is not a end display such as shown in Fig. 14 of Saito, rather, it is a source for generating user interfaces. The user interface description is created as an intermediate step between obtaining device information and generating user interfaces for display. Saito does not disclose such limitations, and the Patent Office has not shown where such a user interface description is taught by Saito.

If Claim 1 is once again rejected, Applicant respectfully requests that the Patent Office specifically point to language in Saito that specifically teaches such limitations, and not simply provide general references to Saito that the Patent Office then interprets as disclosing such limitations, out of context of the present invention. For at least these reasons, rejection of Claim 1, and all claims dependent therefrom, should be withdrawn.

**As per Claim 2**, Saito does not disclose an “interface device” that includes information about the second devices, as described above. As such, it is respectfully submitted that rejection of Claim 2, and all claims dependent therefrom should be withdrawn.

**As per Claim 3**, Saito does not describe a first and a second network wherein the first network is a 1394 bus network and the second network is a non-1394 bus network. Indeed in

Fig. 7, Saito shows the 1<sup>st</sup> HOME NETWORK as a “1<sup>st</sup> 1394 BUS” network and the 2<sup>nd</sup> HOME NETWORK as a “2<sup>nd</sup> 1394 BUS” network. Both the 1<sup>st</sup> and 2<sup>nd</sup> HOME NETWORKS are 1394 bus networks. Further, even using the Patent Office’s interpretation of Saito’s Fig. 7 (Office Action, page 2, last paragraph), the home network 203 is a 1394 bus network to which the home automation network 212 is connected. The network 212 then is a part of the 2<sup>nd</sup> HOME NETWORK which is a 1394 bus network. As such, the home automation network 212 is a 1394 bus network. Saito does not classify the home automation network 212 as separate from the 2<sup>nd</sup> HOME NETWORK, or as a non-1394 bus network. If the Patent Office believes otherwise, Applicant respectfully requests that the Patent Office specifically point to language in Saito that teaches such limitations. For at least these reasons, rejection of Claim 3, and all claims dependent therefrom, should be withdrawn.

**As per Claim 4**, Saito does not disclose that “the interface device includes an address extension table for the second devices” and that obtaining information from the interface device “further includes the steps of using the address extension table to access said second devices,” as required by Claim 4. The Patent Office contends that Saito discloses such limitations in col. 24, line 41 to col. 25, line 3, which discusses using port addresses in the PC 210 for the connecting devices 213 and 214. This has nothing to do with an address extension table because the port addresses in Saito do not form a table. Further, Saito does not disclose an extension table includes IP addresses for the second devices in the second network. And, as described above, the

PC 210 is not even an interface device as claimed. For at least these reasons, it is respectfully requested that rejection of Claim 4 be withdrawn.

**As per Claim 5**, Saito does not disclose that the interface device is a bridge device. As discussed the PC 210 is not an interface device, and certainly not a bridge. Saito does not mention anything about a bridge for connecting two different networks. The Patent Office reads into Saito that a bridge is inherent in the PC 210. This is not the case. The Patent Office is requested to specifically point out to language in Saito where such limitation is disclosed. Indeed Saito teaches away from using bridges (col. 12, lines 31 - 34 and col. 17, lines 43-57). Therefore, for at least these reasons, rejection of Claim 5 should be withdrawn.

**As per Claim 6**, Saito does not disclose displaying one or more user interfaces each based on one of said one or more user interface descriptions, on one or more devices connected to the first network capable of displaying a user interface, for user control of said first and second devices. As discussed in relation to Claim 1 above, Saito does not teach generating a user interface description, and does not teach generating a user interface based on such a user interface description. As such, at least for these reasons, rejection of Claim 6 and all claims dependent therefrom should be withdrawn.

**As per Claim 7**, as discussed Saito does not disclose generating a user interface

description as claimed. Further, Saito does not disclose displaying a user interface based on such a user interface description by: using each reference in the corresponding user interface description to access the associated information in each device, generating the user interface including device data corresponding to each device using the accessed information in each device, and displaying the user interface on said device capable of displaying a user interface, as required by Claim 7.

The Patent Office's interpretation of Fig. 14 and col. 23, lines 12-23 of Saito as disclosing such limitations is respectfully traversed. Saito simply shows generic screens where various network elements are each shown as a box with text therein. There is no teaching in Saito of using a reference, such as a link, in a user interface description to access the device information of a device connected to the network, and then generate a user interface based on the accessed information for display, as claimed. According to the present invention, this feature allows each device to provide its own unique identifying information and the way such information should be presented in the user interface.

Though in col. 23, lines 12-23, Saito mentions that a user can access a device using the screen on Fig. 14, there is no teaching that such a screen is generated using links in a user interface description, to access device information of devices connected to the network, in order to generate an actual user interface for display and user interaction. Saito does not describe a



mechanism of generating the various display screens that is even remotely similar to that claimed. If Claim 7 is once again rejected, Applicant respectfully requests that the Patent Office provide detailed explanation of how and where such limitations are disclosed in Saito.

**As per Claim 8**, Saito does not disclose generating a user interface description by associating a hyper-text link with the device information of one or more of said first and second devices, as required by Claim 1. The Patent Office interprets Saito, col. 33, line 57 to col. 34, line 8, as disclosing such limitations. However, it is respectfully submitted that nowhere in Saito are such limitations disclosed. In the passage relied upon by the Patent Office Saito states:

The home page to be created here enumerates icons and character strings representing the service providing devices to be recognized by the user, as shown in FIG. 28, for example. This home page may be constructed in such a manner that it can be reached through the hyperlink from a character string or an icon for "devices at my home", for example, within an initial home page to be presented by the WWW server of that home by default, for example. Note that it is preferable to use some authentication procedure at a time of moving to this "devices at my home" home page in order to prevent intrusion by unauthorized third person.

This home page of FIG. 28 is created such that, when the icon or the character string on the home page as shown in FIG. 28 is clicked, the corresponding service providing device or the home page of that service is displayed. For example, when the icon of the DVD player is clicked in the home page of FIG. 28, the "home page of DVD player" as shown in FIG. 31 which is linked to that icon will be displayed.

Saito simply describes a home page that may be reached through a hyperlink from an icon, and when such an icon is clicked the home page of a corresponding device is displayed.

Although Saito discusses a home page with icons, it does not disclose how the home page screen is generated. Saito only describes that a home page includes icons that when clicked show home page of a corresponding device.

Specifically, Saito does not describe generating a user interface description. Saito does not describe that the user interface description includes hyper-text links to information of the devices currently connected to the network. Saito does not disclose that the hyper-text links in the user interface description are used to access information associated with the devices currently connected to the network in order to generate a user interface for user interaction. As such, for at least these reasons, rejection of Claim 8 should be withdrawn. If Claim 8 is once again rejected, Applicant respectfully requests that the Patent Office provide detailed explanation of how and where such limitations are disclosed in Saito.

**As per Claims 9 and 10**, Saito does not disclose that the device information in each device includes a user control interface description for user interaction with the device (Claim 9) and that a user interface description is generated such that each reference in that user interface description is to at least the user control interface description in each corresponding device (Claim 10). As discussed, Saito does not disclose a user interface description. Saito does not describe that the user interface description includes references to device information of the devices currently connected to the network. Saito does not disclose that the references in the user

interface description are to user control interfaces in each corresponding device, wherein the user control interfaces are accessed using the references in the user interface description and shown on a display as a user interface.

The Patent Office interprets Fig. 14, col. 23, lines 12-23 and col. 25, lines 34-59 in Saito as disclosing such limitations. However, in those passages, Saito simply describes a screen display, and does in anyway disclose that the device information in a device includes a user control interface. Saito does not describe that the actual screen display is stored in a device connected to the network. In other words, Saito does not disclose that a device connected to the network has a specific user control interface therein, which is then accessed via a reference in a user interface description to generate a user interface that displays the specific user control interface of that device for user interaction. This is an advantage of the present invention, because each device connected to the network has its own control user interface for access and display for user interaction. From time to time, each device connected to the network can change its control user interface which is then accessed and displayed to users. As such, for at least these reasons, rejection of Claims 9 and 10 should be withdrawn. If Claims 9 and/or 10 are once again rejected, Applicant respectfully requests that the Patent Office provide detailed explanation of how and where such limitations are disclosed in Saito.

**Claims 11-20** were rejected for similar reasons as Claims 1-10, respectively. The

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rejections are respectfully traversed for at least the reasons provided above in relation to Claims 1-10, respectively. Therefore, for at least these reasons, rejection of Claim 11-20 should be withdrawn. Further, new claims 21-27 are allowable for similar reasons.

**Conclusion**

For these and other reasons, it is respectfully submitted that the rejection of the claims should be withdrawn, and all of the claims be allowed. Accordingly, reexamination, reconsideration and allowance of all the claims are respectfully requested.

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